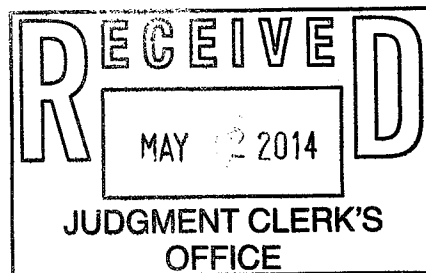


IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

FLAME S.A.,)
)
Plaintiff,)
)
GLORY WEALTH SHIPPING PTE LTD.)
)
Consolidated Plaintiff,)
vs.)
)
INDUSTRIAL CARRIERS, INC.)
VISTA SHIPPING, INC., and)
FREIGHT BULK PTE. LTD.,)
)
Defendants.)

Case No. 14 Misc. 0146

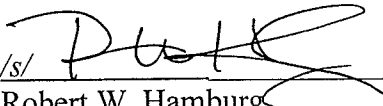


NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Robert Hamburg, dated May 12, 2014, and the exhibits attached thereto, and the accompanying Memorandum of Law, and any other submission that shall be made in support of this motion, the undersigned counsel, on behalf of FREIGHT BULK PTE. LTD, will move this Court pursuant to Rule 45(d)(2)(B)(i) of the Federal Rules of Civil Procedure, to Compel Compliance with the Subpoena Issued to James H. Power Esq, before the Part 1 judge at 10:00 AM on the 3rd day of June, 2014 at the United States Courthouse, 500 Pearl Street, New York, New York, 10007. This motion seeks an Order directing the establishment of a date-certain for James H. Power, Esq. to be deposed, and for other such relief that the Court deems just and proper.

Dated: May 12, 2014

Respectfully submitted,

By: /s/ 
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*Attorney for Specially Appearing
Defendant FREIGHT BULK PTE. LTD*